

# **EXHIBIT 2**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

WOLVERINE WORLD WIDE, INC.,

Plaintiff,

Case No. 1:19-cv-00010-JTN-SJB

v.

THE AMERICAN INSURANCE COMPANY, et al.,

Honorable Janet T. Neff  
Mag. Judge Sally J. Berens  
Special Master Paula Manderfield

Defendants.

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**AFFIDAVIT OF JULIO C. VELEZ IN SUPPORT OF THE TRAVELERS INDEMNITY  
COMPANY'S RULE 53(F)(2) OBJECTIONS TO THE SPECIAL MASTER'S ORDER ON  
WOLVERINE WORLD WIDE'S MOTION TO COMPEL PRODUCTION OF TRAVELERS'  
INSPECTION REPORTS**

I, Julio C. Velez, having been first duly sworn under oath, state as follows:

1. I am over eighteen years of age and am competent to testify to the facts set forth herein and, if called as a witness, would so testify to these facts.
2. I have personal knowledge of the facts, matters and statements set forth herein.
3. I am currently employed by The Travelers Indemnity Company ("Travelers") as a Legal Specialist in the Claim Legal – SRG department and am authorized to execute this affidavit on behalf of The Travelers Indemnity Company.
4. My position requires me to be personally familiar with the record-keeping systems as they pertain to commercial lines accounts and insurance policies issued by Aetna and Travelers.
5. Because of my position and job responsibilities, I have personal knowledge of the facts set forth in this declaration.

6. Any documents responsive to the discovery request at issue in Wolverine's Motion to Compel Production of Travelers Inspection Reports would be contained either within underwriting files or within the records of the Risk Control Department.

7. The Travelers Indemnity Company has historically had one business unit that is responsible for engineering and loss control. This business unit inspects its insureds' operations (at the request of the underwriter and/or policyholder) to identify and monitor for industrial hygiene and related risks.

8. This business unit has had different names over the course of its existence: at one time it was known as the Engineering Department; it then became known as the Loss Control Department. The business unit is now known as the Risk Control Department. At no time has there been more than one business unit within Travelers responsible for engineering and loss control.

9. I contacted the records custodian for the Risk Control Department for the purpose of obtaining documents responsive to the request for "documents and communications related to any inspections, audits, site visits, and/or evaluations performed by [Travelers] with respect to any of Wolverine's sites or operations or locations, including, but not limited to those at issue in the Underlying Actions."

10. I did not limit the time frame of the search and requested that the Risk Control Department search for any documents related to any inspections, audits, site visits, and/or evaluations with respect to any of Wolverine's sites, operations or locations, including, but not limited to those at issue in the Underlying Actions.

11. The Risk Control Department did not locate any responsive documents as a result of their search.

12. Any other documents relating to inspections, audits, site visits or evaluations performed by Travelers with respect to Wolverine, to the extent they still exist, would be contained within Travelers' underwriting files.



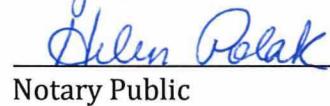
JULIO C. VELEZ

State of Connecticut )  
                         )SS.  
City of Hartford    )

I, Helen Blak, a Notary Public in and for the State of Connecticut, hereby certify that Julio C. Velez did personally appear before me and after being duly sworn stating that he is duly authorized to execute the foregoing Affidavit, and that the information stated herein is true and correct to the best of his information belief.

Sworn and subscribed before me this 30<sup>th</sup> day of August, 2023.

My commission expires: 10/31/2027



Helen Polak  
Notary Public

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